UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXESERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

UNITED STATES OF AMERICA, S Plaintiff S S

S v. CRIMINAL NO. S

H-96-143 DEWAYNE EVERETTE MARTIN S and S FREDERICK LEE BOWMAN, JR.

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about July 9, 1996, in the Houston Division of the Southern District of Texas, the defendants,

DEWAYNE EVERETTE MARTIN

and

FREDERICK LEE BOWMAN, JR.,

did unlawfully seize, confine, kidnap, abduct, and carry away; and held for immoral purposes k \mathbf{C}' and A : E and willfully transported them in interstate commerce from Missouri City, Texas to the vicinity of New Iberia, Louisiana.

In violation of Title 18, United States Code, Sections 2 and 1201.

COUNT TWO

On or about July 9, 1996, in the Houston Division of the Southern District of Texas, the defendants,

DEWAYNE EVERETTE MARTIN

FREDERICK LEE BOWMAN, JR.,

with intent to cause death or serious bodily harm took a Motor vehicle that had been transported in interstate commerce, that is a Ford Thunderbird bearing Texas License Plate SRZ91F, from the person and presence of Ronesha Campbell and Artis Stewart by force, violence and intimidation.

In violation of Title 18, United States Code, Sections 2 and 2119.

COUNT THREE

On or about July 9, 1996, in the Houston Division of the Southern District of Texas, the defendants,

DEWAYNE EVERETTE MARTIN

and

FREDERICK LEE BOWMAN, JR.,

knowingly used and carried a firearm, that is a 9MM, Hi-Point, Model G, semi-automatic pistol, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is a violation of Title 18, United States Code, Section 1201 as set forth in Count One of this indictment.

In violation of Title 18, United States Code, Sections 2 and 924(c)(1).

COUNT FOUR

On or about July 9, 1996, in the Houston Division of the Southern District of Texas, the defendant,

DEWAYNE EVERETTE MARTIN,

having been convicted on November 11, 1992 of Delivery of Cocaine in Harris County, Texas, a crime punishable by imprisonment for a term exceeding one year; possessed in and affecting commerce a firearm, that is a 9MM, Hi-Point, Model G, semi-automatic pistol, which had been shipped in interstate commerce.

In violation of Title 18, United States Code, Sections 922(g) and 924(a)(2).

COUNT FIVE

On or about July 9, 1996, in the Houston Division of the Southern District of Texas, the defendant,

FREDERICK LEE BOWMAN, JR.,

having been convicted on January 4, 1994 of Burglary of a Habitation in Fort Bend County, Texas, a crime punishable by imprisonment for a term exceeding one year; possessed in and affecting commerce a firearm, that is a 9MM, Hi-Point, Model G, semi-automatic pistol, which had been shipped in interstate commerce.

In violation of Title 18, United States Code, Sections 922(g) and 924(a)(2).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

GAYNELLE GRIFFIN JONES United States Attorney

By:

RICHARD K. HARRIS

Assistant United States Attorney

Juilette La Chapelle

Assistant United States Attorney